

RAILROAD COMMISSION OF TEXAS

GAS UTILITIES DIVISION

March 11, 1982

Mr. Melvin A. Judah
Acting Associate Director for
Pipeline Safety Regulation
Department of Transportation
Research and Special Programs Admin.
Materials Transportation Bureau
400 Seventh Street, S.W.
Washington, D. C. 20590

Dear Sir:

Recently we have confronted a perplexing problem regarding the interpretation of 192.625(b), and also when or if a transmission pipeline may become a distribution main. The questions are stated below, and may I express the urgency necessary for reply.

- I. An industrial customer received unodorized gas from a pipeline which operated at greater than 20 percent SMYS, passed through class 1 and 2 locations, prior to May 5, 1975. The customer used the gas for purposes and processes which did not require nor would have been affected by a malodorant additive. In 1979, the customer began hydrogen production which required unodorized gas, in that, malodorant sulfur compounds severely affect catalyst activity. During 1980 it was determined that the class location along the pipeline from the end and upstream for several miles had changed to class 3.
 1. Is the pipeline, in the class locations, exempt from odorization?
 2. If there are 30 other customers along the pipeline not requiring unodorized gas, does the one which requires unodorized gas govern the determination?
 3. Is it necessary that the process requiring unodorized gas was performed before May 5, 1975, or just that unodorized gas was served before May 5, 1975, to create an exemption under 192.625(b)(2)?

II. A pipeline has been called a transmission line, but through the years numerous customers have been added and population density has increased along the line.

1. When and/or under what conditions would this pipeline become a distribution main?
2. Does it make a difference if all of the customers are large industrial customers, located in a densely populated area?

Sincerely,

M. L. Regenbush, Jr., P.E., C.S.P.
Director
Pipeline Safety and Engineering

NOTE: A DIAGRAM IS ENCLOSED WITH THIS LETTER.